

### **REMARKS**

Claims 1-6, and 8-9 are pending in the present application and stand rejected. By the above amendment, claims 1-6 and 8-9 have been cancelled without prejudice and replaced by new claims 10-19.

#### **Amendment to the Specification**

Applicants contend that the Examiner incorrectly asserts that the previously filed amendment of 12/7/2007 (and other previous amendments) contains new matter or otherwise attempts to establish relationships that did not previously exist. Applicants have made several good faith attempts to address the Examiner's 112 rejections and new matter objections to no avail. The Examiner repeatedly contends in the Office Action that Applicants essentially do not seem to understand the issues presented or explained by the Examiner. This is true to some extent, but only because of the fact that the 112 rejections and new matter objections are so patently erroneous, Applicants have found it difficult to understand what the Examiner is seeking.

In fact, despite numerous attempts by the Applicants at addressing these issues, Applicants have been met with relentless objections by the Examiner based on conclusory assertions and with no suggestions or guidance by the Examiner with respect to claim amendments that would be acceptable to the Examiner to resolve these issues. Accordingly, at this point, the Examiner's continued objections/rejections in this regard leading to protracted and unnecessary prosecution.

Notwithstanding, in the interests of cooperation, Applicants have once again amended the specification in one last sincere effort to address the Examiner's issues and hopefully resolve any remaining 112 or new matter issues. The specification amendments

are all supported. The changes made to elements 104a and 104b are supported by FIG. 1. The amendment with regard to the addition of the phrase The service engine supports synchronized communications through a session manager as well as asynchronous communications through a queue manager is clearly supported by Claim 4 as originally filed and the illustrations of the queue and session manager blocks in FIG. 1 and Table 1.

The amendments made to the brief descriptions of Fig. 4 and Fig. 5 are wholly supported by the illustrations in FIGs. 1, 4 and 5 as well as corresponding text of the specification.

Moreover, the specification amendment adding the clause:

The device-platform interface may provide a corresponding gateway for each device, for transforming the information representation XML into a file format which is adapted for various devices for displaying and transforming among communication protocols based on the script language of various devices stored in the device profile is supported by the disclosure of claim 6 as originally filed

In short, the above specification amendments are fully supported and do not constitute new matter or otherwise attempt to establish relationships that did not previously exist.

#### **Claim Rejections – §112**

Claims 1 and 4 stand rejected under 35 U.S.C. §112, first paragraph for the reasons presented by the Examiner in paragraphs 16 and 17 in the Office Action. Applicants contend that these rejections are improper for at least those reasons previously asserted by Applicants. The Examiner fails to understand that the Written Description Requirement only requires that *one of ordinary skill in the art would find that at the time of filing of the*

*application, the Application had possession of the claimed subject matter by virtue of explicit, implicit and inherent disclosure and teachings as provided by the textual description and drawing illustrations of the specification, as well as by general knowledge of one of ordinary skill in the art.* Despite the Examiner's assertions to the contrary, the Examiner has ignored these legal requirements and continues to interpret the written description requirement as requiring specific written, verbatim disclosure. Notwithstanding, the specific rejections of claim 1 and 4 are essentially moot by virtue of claims 1 and 4 being canceled without prejudice.

### **Claim Rejections – §102**

Claims 1-2, 4, 6, and 8-9 stand rejected under 35 U.S.C. §102 as being anticipated by Lonroth. The specific rejections are moot by virtue of the claims being canceled without prejudice. However, with regard to claim 10, Applicants contend that Lonroth is legally deficient to establish a prima facie case of anticipation against claim 10.

For example, at the very least, Lonroth does not disclose or suggest a *service abstraction layer to (i) enable seamless access to different types of services through invocation of backend data sources through service wrappers, wherein each service wrapper provides a standard interface to a corresponding one of the different types of services and (ii) transform backend data formats into XML formatted documents.*

The Examiner contends that the XML gateways (232,234) of Fig. 2 of Lonroth are service adapters (or wrappers) for each of the services that transforms between service responses and XML responses. The Examiner's interpretation of the subject matter of Lonroth is seemingly incorrect. Lonroth specifically teaches that *a preprocessor responds to request by generated XML structured request objects with unresolved lines to data*

*sources that have information requested by the clients and the XML process resolves the links by issuing requests to the data sources through one or more gateways (see, Abstract, Col. 6, lines 26-40) . The gateways in Lonroth are not service wrappers that provide a standard interface to a corresponding one of the different types of services.*

Accordingly, for at least the reasons above, Lonroth does not anticipate claim 10. Moreover, claims 11-17 are patentable over Lonroth at least by virtue of their dependence from claim 10.

**Claim Rejections – §103**

The rejection of claims 3 and 5 are moot as claims 3 and 5 are currently canceled without prejudice. Therefore, withdrawal of the above obviousness rejections is requested.

Submitted,

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